



Gina M. DeCrescenzo

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PARALEGAL

Charlie Lolis

October 6, 2021

Hon. Cathy Seibel
U.S. District Judge
U.S. Courthouse
300 Quarropas St
White Plains, NY 10601
By *ECF*

Re: A.S. o/b/o A.B. v. M
(CS) (S.D.N.Y.)

Defendant may have until 11/12/21 to respond to the Complaint.

The Clerk of Court is respectfully directed to seal ECF No. 1. Plaintiff shall refile the Complaint substituting the minor child's initials for the child's name, and that refiled Complaint shall be the operative Complaint and will be deemed to have been filed on 8/17/21. The viewing level should be "Sealed."

SO ORDERED.


CATHY SEIBEL, U.S.D.J. st., 21 Civ. 6937

10/6/21

Dear Judge Seibel:

Jointly with counsel for Defendant Mamaroneck Union Free School District, Mark Rushfield, Esq., I write respectfully to convey two administrative requests.

I. Joint Request to Extend Defendant's Time to Respond to Complaint. Mr. Rushfield has requested an extension of time to respond to the Complaint, to November 12, 2021. The current response deadline is October 12, 2021. No previous requests for extension have been made. Mr. Rushfield states the reason for his request is his responsibilities in other pending matters he is handling. The Plaintiffs have no objection to this request; therefore, please consider it a joint request to extend the Defendant's time.

II. Joint Motion to Seal Complaint, with Redacted Complaint to Be Publicly Filed. The Complaint, ECF No. 1, generally refers to minor child A.B. by his initials in conformance with Fed. R. Civ. P. 5.2(a)(3). Inadvertently, the given name of the minor child was printed in a single paragraph of the Complaint. The parties are proposing as follows: (1) That the Court seal the Complaint, ECF No. 1; (2) That the Court direct the Plaintiffs to file, publicly, a corrected version of the Complaint which shall be the same in all respects as the original Complaint, except that in the paragraph in question, the initials of the minor shall be used in place of his given name. Said corrected Complaint shall be deemed the operative complaint.

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I sincerely thank the Court for its consideration of these requests.

Very truly yours,



Benjamin Brown

Bar No. BB 1614

Counsel for Plaintiffs

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CC: Mark Rushfield, Esq. (by e-mail)